

Before the  
Federal Communications Commission  
Washington , D.C. 20554

In the Matter of

Digital Audio Broadcasting Systems  
And Their Impact on the Terrestrial  
99-325  
Radio Broadcast Service

) MM Docket No.

Comments of AM Owner Larry Langford

I am the owner and operator of WGTO AM 910 kHz a 1 kilowatt station  
licensed to Cassopolis, Michigan, a town of 2000 people located in a county of  
about 55,000 people. The county has three broadcast stations WGTO ,  
WDOW AM and WDOW FM.

I am a broadcast engineer and have been involved in the design, construction  
and operation of several stations. I built WGTO in the late eighties when the  
AM stereo issue was a hot topic.

I watched carefully as the AM stereo issue melted down to nothing more than  
a complete mess that our industry never recovered from.

As I now watch what is happening with IBOC AM it is clear that we have not learned from our mistakes but are in fact repeating them again.

It is clear from comments and engineering reports that IBOC AM is flawed to say the least. What good is a system that provides better quality audio on AM that would benefit only 50kw stations in their most local coverage area? While at the same time shrinking the usable coverage of the vast majority of stations that make up the heartland of radio broadcasting, the stations operating at 5kw or less.

Portions of the public, and many in the radio industry already have the opinion that the FCC is biased against true AM improvement for all but 50kw talk stations or major group station companies like Infinity or Clear Channel for the following reasons;

1. Failure to mandate a stereo standard for AM in the 1980's.
2. Failure to require new radios to receive AM stereo even after the world adopted C-Quam as the defacto or official standard.
3. Failure to require Expanded Band receivers to receive AM stereo despite the fact that new radios had to receive the expanded band. All while encouraging that new expanded band stations transmit stereo.

4. Adopting the NRSC standard for 10kHz cut off to eliminate adjacent channel problems and then never adopting a companion receiver standard that would have easily provided drastically improved music audio by providing even a basic audio requirement that would have increased audio band pass from the typical 2.5 kilohertz (speech) to a much more competitive 7.5 kHz or even a compromise 5 KHz.
5. Not allowing use of vacant FM frequencies by LOCAL AM for fill in, night or translator use while at the same time allowing local full power FM broadcasters and FM broadcasters in markets hundreds of miles away to operate low power translators effectively competing with LOCAL AM markets for listeners if not advertisers.
6. Locking out stand alone AM stations even in very rural areas from application for LPFM operation even when AM service is the only service in the community and more than one LPFM channel is available, forcing unfair competition from LPFM stations that take advertising dollars in the form of “underwriting announcements” and local sports programming.
7. Creating expanded band operation then allowing the sale and movement of expanded band permits to effectively allow new stations in markets that did not originally have expanded band

operation. Allowing major companies like Clear Channel to add AM outlets in saturated markets . i.e. WRLL 1690 Berwyn Illinois (Chicago) originally located in downstate Illinois.

8. Backing down on original requirements that expanded band licensees cease operation of the old standard band license or the new expanded band license after no more than five years of operation.
9. Allowing expanded band stations to operate separate programming from the main standard band station. Effectively putting any other stand alone stations in the market at a disadvantage by having to compete against the new expanded band station and its standard band parent.

We should be very clear that even in its most optimistic state IBOC-AM will still make AM stations operate under a second class arrangement. No digital operation at night and the now proven very serious problem of effective range reduction due to both second adjacency hiss and the fact that digital decoding will result in less usable range than many stations enjoy in analog mode.

This will put stations operating at the very common power level of 1 kilowatt at an extreme disadvantage in their own main service areas.

Time and time again the United States has been the pioneer of something new but has been unable or unwilling to keep up with improvements and change because of the “dinosaur effect.” In this regard we refuse to learn from other nations. A quick look around the world will show that in order to best serve the public and protect the viability of ALL broadcasters on an equal basis, the only sane way to implement digital broadcasting is to do it on separate spectrum. Others have made comments in this proceeding that bear further study. Among the suggestions is the use of spectrum now assigned to TV channels 5 and 6. Many good arguments have been made for this move and I support them. I would like to add that such a move to the 76 to 88 MHz portion of the band would allow full digital only operation that would take advantage of the best power versus range ratio not available in AM or FM hybrid operation. Exclusive digital operation would make spacing and coverage matters easy to handle.

As a standalone AM station owner, I have seen and admired all of the well intentioned efforts to improve the service from the industry side such as the well researched and market successful Optimod processor as a way of improving the perceived quality of AM. Or the efforts of GM and Ford to make wideband car radios in recent years (although they have now reverted to narrow operation). Also the efforts made by Kahn Communications to improve AM and in fact promote a digital system that seems to address many

if not all of the negative issues now facing us with the current IBOC system now under study.

But the fact is, AM will never have an equal footing with FM. It's just not going to happen from a technical standpoint. For all the benefits of its ability to provide long range night service, Amplitude Modulation will never have the ability of Frequency Modulation from a noise and fidelity perspective.

AM remains the most expensive of facilities to build and maintain due to ground systems and multiple towers. I am among the broadcasters who made the investment in AM thinking that we had turned the corner in the late eighties. It has been a disappointing trip. We should take this opportunity to stop before we go far too far and correct the situation. The fact that Ibiquity has invested millions of dollars in their IBOC system is a matter of investment speculation. They are not the first company to invest heavily and then find out the product or service was not all it could be. We the medium and low power American AM broadcasters should not be made to continue to have a back seat just because some corporation backed by some of the nations largest broadcast companies wishes to continue down a road that is plagued by serious potholes and technical problems. Those at the design table for AM IBOC knew at the onset that the possibility existed for serious interference from digital "hiss".

Early promotion of the Ibiquity system hailed it as putting AM and FM on equal footing. Can we now agree that we were looking thru rose colored

glasses? With the vast number of AM stations in this nation that will suffer and face almost certain death with this new IBOC system, I say it is not worth it. It is also unheard of to have the government back a system that never faces any real competition and charges what it feels is correct for the licensing of the product. It may look like a great business model for the investors but, pardon my language, we the AM operators of the nation are being screwed.

It would be a bold move for the FCC to reject the Ibiquity system as unworkable and propose using spectrum for a new digital service that would allow existing AM and FM stations to use digital technology not hindered by serious issues of existing analog compatibility and interference. In my years of watching FCC issues I do not think I have ever seen such a clear cut case of comments. We see a wide range of engineers and owners showing the flaws of this system. At the very least it's a failure at its original claims. What would be worse is to miss this chance not to stop and rethink the subject of new spectrum. For once lets do it right the second time around. New spectrum for AM and FM digital is the right way to go. Or at the very least lets debate it and give it more study. The current IBOC backers are doing all they can from a lobbying standpoint to tell us that the bad is not so bad and that this is really the only way to go faults and all. Well I stand strong to say that is little more than a public relations ploy. This is the USA with some of

the best engineers and technology in the world, but making IBOC AM work seems like trying to put wings on a submarine and call it an airplane.. it just does not work for AM, period! The FCC should order the use of IBOC AM stopped at once. Many stations have numerous complaints and engineering documentation that proves that current IBOC operation causes extreme interference to analog operation. If this interference were coming from anything but IBOC, the FCC would have ordered a shut down of the offending station pending resolution of the problem. Why is IBOC different? To the average listener noise is noise! Are we the small AM broadcasters supposed to sit back and allow years of diminished service until we can afford to convert and pay the fees being charged by Ibiquity? This cannot be happening.

Respectfully submitted;

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